

FILED

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

MAR 13 2014

for the  
Western District of TexasCLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature] DEPUTYUnited States of America  
v.

Michael PEREZ

Case No. A14M-118

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/11/2014 in the county of Travis in the  
Western District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

841(a)(1) and 846

Conspiracy/Possession with Intent to  
Distribute Methamphetamine

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.[Signature]  
Complainant's signature

James Littlepage, Deputy Sheriff

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/13/2014[Signature]  
Judge's signatureCity and state: Austin, Texas

Printed name and title

**ARREST AFFIDAVIT ATTACHMENT SHEET FOR MICHAEL PEREZ AND  
STEPHANIE ANDRADE**

On March 11, 2014 Travis County Sheriff's Office Vice Unit Investigator James Littlepage arrested Stephanie ANDRADE and Michael PEREZ for the state violation of Possession of a Controlled Substance, to wit approximately 512 grams methamphetamine in Travis County County, Texas.

On February 5, 2014, James Littlepage ( a Travis County Sheriff's Office Deputy Sheriff's assigned to the Vice Unit as an Investigator) received information about female subject named Stephanie was selling and delivering Methamphetamine in a white truck with the Texas license plate CRD2342. Investigator Littlepage conducted a computer search which showed the vehicle returned to a:

2007 White Dodge Truck  
ANDRADE, Stephanie  
6301 Vida Nueva Avenue, Del Valle, Tx. 78617.

Investigator Littlepage conducted a computer search and found ANDRADE had a Texas Driver's License (TXDL), and obtained a copy of the TXDL photograph.

Investigator Littlepage conducted surveillance about March 4, 2014 at the residence at 6301 Vida Nueva Avenue, and observed the white Dodge truck with Texas License plate CRD-2342 in the driveway, along with a 1998 White BMW displaying Texas license plate: CNP2351. Investigator Littlepage requested Travis County Sheriff's Office dispatch query the license plate. Dispatch advised the license plate returned to the BMW with a registered owner of Michael PEREZ. Investigator Littlepage queried the Texas driver license database and obtained a driver license photograph of PEREZ.

Investigator Littlepage conducted surveillance on March 6, 2014 at the residence. When Investigator Littlepage arrived, the BMW was the only vehicle in the driveway. Investigator Littlepage observed a brown Hyundai Sonata displaying Texas license plate CT5-N811 pull into the driveway of the residence about 1:00 p.m. Investigator Littlepage observed a female, whom he recognized to be ANDRADE from her driver license picture, exit the residence. ANDRADE walked outside and motioned to the driver of the Hyundai to park on the street. The driver of the Hyundai moved the vehicle to the street, and exited. Investigator Littlepage observed the female driver of the Hyundai exit the vehicle and enter the residence with ANDRADE without anything in her hands. A few minutes after the female entered the residence, Investigator Littlepage observed the white Dodge truck pull into the driveway and a male, whom Investigator Littlepage recognized to be PEREZ, exit the vehicle, and enter the residence. The female driver of the Hyundai exited the residence a few minutes later with a small green gift bag in her hands, looked around nervously, entered her vehicle and sped away.

During the week of March 9, 2014, Investigator Littlepage received information from a CI that ANDRADE would be distributing ounce-quantities of methamphetamine later that week. Investigator Littlepage had earlier corroborated information given by this CI regarding

ANDRADE. On 03/11/2014, Investigator Littlepage conducted surveillance again with the assistance of other members of the Travis County Sheriff's Office Vice Unit and a K9 Deputy.

About 12:00pm, ANDRADE was observed exiting the residence at 6301 Vida Nueva by Investigator G. Williams. ANDRADE had a brown purse over her shoulder, and got into the passenger seat of the Dodge truck. PEREZ exited the residence and got into the driver's seat of the truck. The vehicle left the residence and constant visual surveillance was maintained. At the intersection of Southwest Parkway and Hwy 71 the vehicle made a right turn onto Hwy 71 and failed to signal the turn. The violation was observed by Investigator A. Viruette.

A K9 Deputy conducted a traffic stop on the vehicle for the violation. The K9 Deputy talked with both occupants of the vehicle and became suspicious illegal narcotics were in the vehicle. The K9 Deputy deployed his police service dog which is trained to detect the odors of marijuana, methamphetamine, cocaine, and heroin. The K9 Deputy conducted an open air search around the vehicle at which time the police service dog alerted to the odor of narcotics from the vehicle. The K9 Deputy conducted a search of the vehicle. In the passenger floorboard of the vehicle was the purse ANDRADE was seen leaving the residence with. Inside the purse, a K9 Deputy located a white crystal substance in five clear plastic bags. Investigator Viruette conducted a presumptive field test on the suspected Methamphetamine which tested positive for the presence of Methamphetamine.

Investigator Littlepage read ANDRADE her Miranda rights and she stated she understood her rights. Investigator Littlepage asked ANDRADE about the Methamphetamine and Andrade admitted the Methamphetamine belonged to her and that there were five ounces of it in her purse.

The brown purse was the same purse she was seen leaving the residence with. The vehicle made no stops after it left the residence. The methamphetamine weighed in at approximately 141 grams.

Investigator Littlepage wrote a state search warrant for the residence at 6301 Vida Nueva, signed by the Honorable Judge David Wahlberg 167th District Court on March 11, 2014 at 3:05 pm.

The search warrant was executed by members of the Travis County Vice Unit and the following items were located:

Approximately 330.1 grams gross weight of a white crystal substance in multiple clear plastic bags which field tested positive for methamphetamines, was found in the bathroom closet in a safe. Two digital scales were also located in the safe with the suspected Methamphetamine.

1 Piece of mail addressed to Michael Perez at 6301 Vida Nueva Ave was found in the office.

Lease agreement for 6301 Vida Nueva Ave to Stephanie Andrade was found in the office.

About 39.5 grams gross weight of a white crystal like substance in clear plastic bags that field tested positive for methamphetamines was found in the nightstand in the master bedroom.

1 Bersa Thunder .380 handgun was found in the nightstand in the bedroom next to the suspected Methamphetamine.

About \$ 1,600.00 of U.S. Currency was found in the Master bedroom

Total weight of methamphetamine located in the safe, in the purse, and in the bedroom was approximately 510 grams.

A criminal history check revealed that ANDRADE has a previous conviction for unauthorized use of a motor vehicle. PEREZ has a prior conviction for aggravated robbery and arrests for engaging in organized criminal activity and aggravated kidnapping with a deadly weapon with no known disposition.

Travis County Sheriff's Office Vice Unit Investigators located personal items for ANDRADE and PEREZ throughout the residence which led Investigator Littlepage to believe they had been living together for an extended period of a time. ANDRADE and PEREZ had clothing and other personal items in the master bedroom and master bathroom where the methamphetamine and firearm were located.